

The Law Office of Keith Altman

33228 West 12 Mile Road, Suite 375

Farmington Hills, MI 48334

516-456-5885

kaltman@lawampmmt.com

Via ECF

Honorable Andrew E. Krause
United States District Court (S.D.N.Y.)
United States Courthouse
300 Quarropas Street, Courtroom 520
White Plains, New York 10601-4150

Re: JOINT LETTER

Aghaeepour, et al. v. Northern Leasing Systems, Inc., et al.;
No. 14-cv-05449

Dear Judge Krause:

Pursuant to Your Honor's directives, the parties were to provide to the Court today a proposed discovery schedule and any remaining discovery issues to be resolved. The parties have met and conferred and believe that we have an agreed path going forward.

The parties have reached an agreement on the two key areas concerning discovery raised before the Court previously.

First, concerning the leasing database, the parties will meet and confer on terms to be searched, and Plaintiffs will perform the search for responsive records. These records will be provided to Defendants who will have an opportunity to object to any particular records. Afterward, Plaintiffs will create a working database that will be provided to Defendants and will form the source of leasing data for further proceedings.

Second, concerning electronically stored e-mails, the parties will meet and confer on search terms, date ranges, and custodians. Once the terms, dates, and custodians have been selected, Defendants will evaluate whether it is more efficient for them to recover sources of responsive documents - some of which are old - or have Plaintiffs search documents already in their possession. If Plaintiffs run the searches, Defendants will have an opportunity to review and object to those documents before use.

Respectfully, the parties request 60 days to work through the mechanics of the above discovery. This discovery will better inform the parties as to what, if any, additional discovery may be needed. The parties propose that on or before May 10, 2021, that we provide a proposed

scheduling order to the Court and that the Court hold a conference soon after May 10, 2021 at the Court's convenience.

Accordingly, parties respectfully submit that the Court conference currently scheduled for March 24, 2021 be cancelled (or postponed until after May 10, 2021).

Finally, as mentioned at the Court conference on February 4, 2021, nothing herein shall waive or otherwise prejudice Defendants' rights to move (and for Plaintiffs' rights to object, if they so choose) for a stay of the above-referenced action, or Defendants' counsel's rights to move to withdraw as counsel, if and when the circumstances concerning Northern Leasing Systems, Inc. and the pending case against it by the Attorney General of the State of New York, warrant such application(s).

Respectfully Submitted,

/s/ Keith Altman

Keith Altman
Counsel for Plaintiffs

Moses & Singer LLP
By: /s/ Scott Silberfein

Counsel for Defendant